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July 1, 2019

Via ECF

The Honorable Frederic Block, U.S.D.J.
United States District Court, E.D.N.Y.
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Buchanan, et al. v. Pay-O-Matic Check Cashing Corp., et al.*
Case No. 18 CV 885 (FB) (SMG)

Dear Judge Block:

We represent Plaintiffs Buchanan, Figueroa, and Jones in the above-referenced action.

On June 27, 2019, counsel for Intervenor Carmen Luyando unilaterally submitted a proposed notice of pendency to collective action members, without first conferring with us or defense counsel. *See* Dkt. No. 85. Subsequently, on June 28, 2019, Defendants' counsel filed a responsive submission including, *inter alia*, proposed edits to Intervenor Luyando's proposed notice. *See* Dkt. No. 87.

This letter is respectfully submitted to advise Your Honor that we object to the proposed notice to Customer Service Representatives submitted by counsel for the Intervenor, and to the notice forms submitted by defense counsel. We intend to file responses in opposition to both proposals, no later than the July 12, 2019 deadline set under Your Honor's June 28, 2019 Electronic Order.

A proposed notice to Manager-Titled Employees will be submitted by the same July 12, 2019 deadline.

We thank Your Honor for considering this matter.

Respectfully submitted,

/s/ Taimur Alamgir
Taimur Alamgir, Esq.

cc: All counsel via ECF